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July 29, 1998

Magalie Roman Salas, Secretary  
Federal Communications Commission  
1919 M Street, NW, Room 222  
Washington, DC 20554

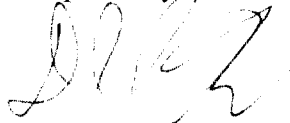
Re: Adminstration of the NANP Carrier Identification Codes, CC Dkt. No.  
92-237; Virgin Islands Telephone Corporation Petition for Waiver, DA  
98-1319

Dear Madam Secretary:

Attached is this "original-copy" and four additional copies of a letter that was sent to Geraldine A. Matisse of the Network Services Division of the Common Carrier Bureau. The Virgin Islands Telephone Corporation respectfully requests that these copies be included in the files of the above-captioned dockets.

Please feel free to contact me if you have any questions.

Respectfully submitted,



Daniel J. Smith

Enclosures

*O+Y*

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July 28, 1998

Geraldine A. Matise, Chief  
Network Services Division/CCB  
Federal Communications Commission  
2000 M Street, N.W., Room 235  
Washington, D.C. 20554

Re: Administration of the NANP Carrier Identification Codes, CC Dkt No. 92-237  
Virgin Islands Telephone Corporation Petition for Waiver, DA 98-1319

Dear Ms. Matise:

By this letter, the Virgin Islands Telephone Corporation ("Vitelco") wishes to respond to the Request for Information regarding the above-captioned proceeding issued by the Network Services Division on July 21, 1998.

*1) Which entity(s) would bear the technical burden of implementing Vitelco's request that the Commission waive its three-digit CIC blocking deadline and allow the use of five-digit CAC dialing until Vitelco has implemented four-digit CIC capability and the resulting seven-digit CAC dialing capability in the Virgin Islands?*

The first query concerns the technical burden of implementing Vitelco's waiver request. In short, the Commission's waiver of the three-digit blocking deadline will not place any additional technical burden on Vitelco nor the interexchange carriers ("IXC"). Currently, Vitelco is the only party that needs to perform any IXC access translation, and this burden would be unaffected by a waiver of the blocking deadline. This is because the CAC and the CIC that is dialed by a Vitelco customer is not actually forwarded to the IXC. Instead, this information is used only by Vitelco to route the call to the facilities of the proper IXC. Once the call is handed off to the IXC, the Vitelco toll switch only needs to pass to the IXC the subscriber's automatic number identification ("ANI") which is then followed by the number used to route the call to the called party (NPA-NNX-XXXX).<sup>1</sup> Nothing needs to change during the transition period.

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<sup>1</sup> In the case of international calls, Vitelco does pass along the CIC as part of the routing code sent to the carrier in conformance with standard practices. However, in the case of Vitelco's international traffic, the CIC is superfluous information because the international call is routed directly to the dedicated facilities of

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*2) Please fully explain the technical effects of Vitelco's request that the Commission waive its three-digit CIC blocking deadline and allow the use of five-digit CAC dialing until Vitelco has implemented four-digit CIC capability and seven-digit CAC dialing in the Virgin Islands. Please discuss the process by which Vitelco could continue to use a three-digit CIC for dial-around traffic routed from the U.S. mainland to the Virgin Islands and from the Virgin Islands to the U.S. mainland.*

In response to the second request, regarding the technical effects of Vitelco's request, just as there is no real additional technical burden created by the delay in implementing the Commission's new CAC and CIC requirements, there will be no real technical effect as well. Again, this is because the CAC and CIC never leave the USVI. Instead, that information is used to route traffic to the selected IXC at Vitelco's toll switch, at which point the only information the IXC requires is the subscriber's ANI and the destination of the call. Further, maintaining five-digit CAC dialing in the USVI will not affect an IXC's use of seven-digit dialing in the mainland United States. This is because an IXC only forwards the seven-digit local number to the USVI for routing. Vitelco does not need the CIC to route the call. The CIC and CAC provides important information to the local switch, not the distant switch. Thus, while a mainland subscriber would dial the CIC-CAC#-1NPA-NNX-XXXX, Vitelco only receives (and requires) NNX-XXXX to route and place the inbound traffic.

*3) What would it cost to implement Vitelco's request that the Commission waive its three-digit CIC blocking deadline and allow the use of five-digit CAC dialing until Vitelco has implemented four-digit CIC capability and seven-digit CAC dialing in the Virgin Islands? Please describe each cost element.*

*4) Which entity(s) would bear the costs of implementing Vitelco's request? How would these costs be recovered?*

The final two queries ask about costs. These are expected to be minimal. The only translation that needs to be accomplished is to route seven-digit access attempts to a recorded announcement. The only other cost is printing and distributing information pamphlets to Vitelco's subscribers informing them of the delay in the new dialing patterns. Because routing the access attempts to a recorded announcement and the distribution of informational pamphlets are both performed by Vitelco, these costs will be borne by Vitelco.

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the IXC on the USVI. Thus, unlike the case where international traffic is sent in tandem, the CIC is not needed to route the call to the correct carrier.

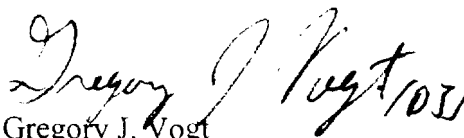
Geraldine A. Matisse, Chief

July 28, 1998

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We hope that this letter has addressed your Request for Information pertaining to this proceeding. Please feel free to contact me at the above number if you have any additional questions regarding Vitelco's CIC waiver request.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Gregory J. Vogt". The signature is stylized with a large, looped "G" and a trailing flourish.

Gregory J. Vogt  
Counsel for Virgin Islands  
Telephone Corporation

cc: Magalie Roman Salas, Secretary, FCC  
Renee Alexander, FCC/CCB/NSD (Fax)